4.8 Transportation

This section of the EIR evaluates potential impacts on the transportation system resulting from implementation of the project. This section identifies the existing transportation conditions in the project vicinity, outlines applicable regulations; analyzes environmental impacts of the project, and recommends mitigation measures, if applicable, to reduce or avoid identified adverse impacts. The analysis is based, in part, on a *Vehicle Miles Traveled (VMT) Analysis* (LOS Engineering 2024a) prepared for the project. The report is included in the EIR as **Appendix F**, *Vehicle Miles Traveled Analysis*.

The VMT Analysis examines project-related VMT impacts for determining transportation impacts pursuant to Senate Bill (SB) 743 (described below in Section 4.8.2, *Regulatory Framework*). With implementation of SB 743, automobile delay, as measured by level of service (LOS) is not considered a potentially significant effect on the environment.

4.8.1 Existing Conditions

4.8.1.1 Existing Circulation System

The project site is located at 501 Ocean Bluff Way. Ocean Bluff Way is a small residential street, approximately 870 feet in length that runs in a west/east orientation. At the western end of the street, there is a 90-degree turn in the road, with approximately 370 additional feet of the street that runs in a north–south orientation and ends in a cul-de-sac. Ocean Bluff Way is not a circulation element roadway. It consists of one travel lane in each direction, with a sidewalk on the south and east sides of the road.

Regional access to the project site is provided via Interstate 5 (I-5), which is located approximately 0.6 miles west of the site. Encinitas Boulevard, which is located adjacent to the north of the site, provides access from I-5 to roadways in the area. Access to the project vicinity from I-5 also occurs at Sante Fe Drive, approximately 0.8 miles southwest of the project. Circulation element roadways providing access in the project vicinity include Nardo Road (from Requeza Street to Santa Fe Drive), Requeza Street (from Westlake Street to Nardo Road), and Westlake Street (Encinitas Boulevard to Requeza Street). Each of these three roadways are classified as a *Local Street* in the Circulation Element, consisting of 2-lane roadways with one travel lane in each direction. Non-circulation element roadways provide access to the project site, including Requeza Street east of Nardo Road, Camino De Orchidia, Camino El Dorado, and Ocean Bluff Way. Each of these roadways are two lanes, with one travel lane in each direction. There is no direct access from Encinitas Boulevard to the project site.

4.8.1.2 Transit Service

Bus and rail services in the City are provided by the North County Transit District (NCTD) and the Metropolitan Transit Service. Bus services include Breeze and rail services include the Coaster. In the project vicinity, bus service routes occur on Encinitas Boulevard (which is adjacent to the north of the project site), on Sante Fe Drive (located 0.7 miles south of the project site) and along El Camino Real (located 0.8 miles east of the project site). Bus routes 304, 309, and 609 serve portions of Encinitas Boulevard, Routes 304 and 604 include portions of Sante Fe Drive, and Routes 304, 309, and 609 run along portions of El Camino Real in the project vicinity. There are no transit routes or

stops along Ocean Bluff Way, or along other nearby roadways including Camino De Orchidia, Camino El Dorado, or Requeza Street.

4.8.1.3 Bicycle and Pedestrian Facilities

The City's Active Transportation Plan (ATP; City 2018a) identifies existing pedestrian and bicycle facilities in the City. In the immediate project vicinity, pedestrian facilities consisting of an existing trail or sidewalk is present along Encinitas Boulevard, as well Camino De Orchidia, Camino El Dorado, a small segment of Requeza Street between Camino De Orchidia and Camino El Dorado, and along Ocean Bluff Way. Bicycle facilities in the project area consist of a Class II Bicycle Lane along Encinitas Boulevard and a Class II Bicycle Lane along Westlake Street. Class II Bicycle Lanes are one-way facilities within roadways placed next to the curb or parking lane for preferential use by bicyclists within the paved area of streets. They are designated by striping, pavement markings, and signage. A Class III Bikeway exists on Requeza Street (between Westlake Street and Nardo Road) and on Nardo Road (between Requeza Street and Santa Fe Drive). A Class III facility is where bicycles and vehicles share the same lane, often times marked with shared lane markings such as a sharrow.

4.8.2 Regulatory Framework

4.8.2.1 State

Senate Bill 375

Adoption of SB 375 in 2008 encouraged land use and transportation planning decisions and investments that reduce VMT and contribute to the reduction of GHG emissions, as required by the California Global Warming Solutions Act of 2006 (Assembly Bill (AB) 32). SB 375 provides a planning process that coordinates land use planning, regional transportation plans, and funding priorities to help California meet GHG reduction goals established in AB 32. SB 375 requires regional transportation plans, developed by metropolitan planning organizations (MPOs) to incorporate a "Sustainable Communities Strategy" (SCS) in its regional transportation plan (RTP). The SCS is intended to demonstrate how the coordination of land use and transportation planning efforts may achieve GHG emissions reduction targets set by AB 32. If an SCS cannot achieve the GHG emissions target, the Metropolitan Planning Organization (MPO) is required to adopt an "alternative planning scenario" that will demonstrate what would need to be done to achieve the GHG emissions reduction target and to define the barriers to accomplishing the reduction.

Assembly Bill 1358

AB 1358 (Complete Streets Act), enacted on January 1, 2011, requires local governments to plan for a balanced, multi-modal transportation network that meets the needs of all users of streets, roads, and highways, including motorists, pedestrians, bicyclists, children, seniors, persons with disabilities, and users of public transportation. The bill imposes a state-mandated local program.

Senate Bill 743

SB 743, which was codified in Public Resources Code Section 21099 on September 27, 2013, required changes to the guidelines implementing California Environmental Quality Act (CEQA) regarding the

analysis of transportation impacts. Specifically, SB 743 required the Governor's Office of Planning and Research (OPR; now named the Governor's Office of Land Use and Climate Innovation) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must promote the reduction of greenhouse gas emissions, the development of multi-modal transportation networks, and a diversity of land uses. To that end, OPR published its *Technical Advisory on Evaluating Transportation Impacts in CEQA* in December 2018, and the California Natural Resources Agency has certified and adopted changes to the CEQA Guidelines that identify VMT as the most appropriate metric to evaluate a project's transportation impacts. With the California Natural Resources Agency's certification and adoption of the changes to the CEQA Guidelines, automobile delay, as measured by LOS and other similar metrics, are no longer the basis for determining a significant environmental effect under CEQA. OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* states "As noted above, lead agencies have the discretion to set or apply their own thresholds of significance."

4.8.2.2 Regional

2021 Regional Plan: San Diego Forward

The San Diego Association of Governments (SANDAG) Board of Directors adopted the Final 2021 Regional Plan in December 2021. The 2021 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The plan combines the RTP, SCS, and Regional Comprehensive Plan. The 2021 Regional Plan contains the following goals in support of its vision for a fast, fair, and clean transportation system and a resilient region:

- The efficient movement of people and goods
- Access to affordable, reliable, and safe mobility options
- Healthier air and reduced GHG emissions

Projects, policies, and programs developed to achieve the 2021 Regional Plan's goals are organized around three core strategies: a reimagined transportation system, sustainable growth and development, and innovative demand and system management.

The 2021 Regional Plan provides guidance for investing an estimated $208 billion in local, state, and federal transportation funds anticipated to be available within the San Diego region over the next three decades. It plans for a regional transportation system that enhances quality of life, promotes sustainability, and offers varied mobility options for both goods and people. The plan addresses improvements for transit, rail and bus service, express and managed lanes, highways, local streets, bicycling, and walking to achieve an integrated, multimodal transportation system by 2050. In accordance with the requirements of SB 375 and as noted above, the plan includes a SCS that provides regional guidance for reduction of GHG emissions to state mandated levels over upcoming years.

4.8.2.3 Local

City of Encinitas General Plan and Local Coastal Program

The City's General Plan is the blueprint for the long-range physical planning of the City. The General Plan contains goals and policies designed to shape the long-term development of the City and protect its environmental, social, cultural, and economic resources. The General Plan consists of an integrated and internally consistent set of goals, policies, and standards that address land use, circulation, housing, noise, safety, recreation, conservation and open space.

The General Plan Circulation Element, amended in 2018, is to establish a sound, safe, and sensible circulation system which promotes the efficient movement of people and goods in and around the City. The Circulation Element also establishes policies and programs which will ensure that all components of the system meet the City's future transportation needs. The Circulation Element identifies the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals and other public utilities and facilities, all correlated with the Land Use Element of the General Plan. The Circulation Element also addressed the circulation improvements needed to relieve congestion, to provide mass transit services, and to lessen long-term air quality impacts related to transportation.

The Circulation Element is undergoing an update, which began in Spring 2021 and would include renaming the Circulation Element as the Mobility Element. This update creates framework to implement SB 743 and will consolidate policies from various strategic, community, and neighborhood plans, such as the CAP, ATP, Rail Corridor Vision Study, and others, into one cohesive, citywide framework (City 2024a).

The relevant goals and policies of the currently approved Circulation Element include the following:

> GOAL 1: Encinitas should have a transportation system that is safe, convenient and efficient, and sensitive to and compatible with surrounding community character. (Public Resources Code § 30252)
>
> > POLICY 1.2: Endeavor to maintain Level of Service C as a basic design guideline for the local system of roadways understanding that the guideline may not be attainable in all cases.
> >
> > POLICY 1.3: Prohibit development which results in Level of Service E or F at any intersection unless no alternatives exist, and an overriding public need can be demonstrated.
> >
> > POLICY 1.10: Encourage the design of roads and traffic controls to optimize safe traffic flow by minimizing turning, curb parking, uncontrolled access, and frequent stops.
> >
> > POLICY 1.15: The City will actively support an integrated transportation program that encourages and provides for mass transit, bicycle transportation, pedestrians, equestrians, and carpooling. (Public Resources Code § 30252)
> >
> > POLICY 1.17: Standards shall be established and implemented to provide for adequate levels of street lighting, based on criteria of safety and related to volumes of vehicular, pedestrian and bicycle activity and potential points of conflict. Such standards shall be designed to respect different community and neighborhood needs for lighting, different community standards for design and special attention given to preservation of dark sky.

GOAL 2: The City will make every effort to develop a varied transportation system that is capable of serving both the existing population and future residents while preserving community values and character. (Public Resources Code §§ 30252/30253)

POLICY 2.2: Require new residential development to have roadways constructed to City standards before the roads can be dedicated to the City.

POLICY 2.3: Design the circulation system serving new development in such a way to minimize through traffic in all residential neighborhoods.

POLICY 2.8: Where necessary, require acquisition of right-of-way as a condition of approval of all final subdivision maps. Encourage landscaping of rights-of-way if not being used for public roads, hiking/riding trails, or beach access trails.

POLICY 2.10: Establish landscaping buffer and building setback requirements along all roads which are local augmented status or larger, except where inappropriate. (Public Resources Code § 30252)

POLICY 2.13: Encourage landscaped medians and parkways on all roadways where practical.

GOAL 3: The City of Encinitas will promote the use of other modes of transport to reduce the dependence on the personal automobile. (Public Resources Code § 30252)

POLICY 3.1: The needs of the handicapped will be considered in new development plans including handicapped parking, loading, etc.

GOAL 7: Every effort will be made to have new development, both in the City and in the region, provide for all costs of the incremental expansion of the circulation system necessary to accommodate that development. Costs include, but are not limited to, costs of right-of-way and construction, including costs of moving utilities and structures, and costs for landscaping and intersection improvement.

POLICY 7.1: The City shall seek to recover circulation system expansion costs from all available sources, without limitations, including development fees for projects both inside and outside the City limits.

City of Encinitas Active Transportation Plan (ATP)

The ATP updates and consolidates the City's active transportation planning efforts (the previous Bikeway Master Plan, the "Let's Move Encinitas Pedestrian and Safe Routes to School Plan", and the Trails Master Plan) to better address local travel needs, crosstown, and regional biking and pedestrian travel. Plan objectives include establishing bicycling and walking facility types and identifying connections between the City's bikeway system and the regional system. The ATP documents and evaluates the City's existing bikeway facility system and its relationship with other systems such as public transit, and recommends access to transit improvements, where appropriate. The ATP recommended bikeway and walkway systems throughout the City. In the vicinity of the project site, the following improvements are recommended:

- A Class I multi-use path and Class IIB (buffered) Bicycle Lane along Encinitas Boulevard;
- A Class II Bicycle Lanes along Westlake and Requeza Streets; and
- Proposed trail/sidewalk along Westlake and Requeza Streets.

Encinitas City Council Ordinance 2019-24

Title 24, *Subdivisions*, and Title 30, *Zoning*, of the Encinitas Municipal Code (EMC) were amended by Ordinance 2019-24. These amendments were made to provide consistent language for the requirements of pedestrian and bicycle connectivity with the objective of maintaining and/or enhancing further connectivity and circulation of pedestrian, bicycle, and vehicular transport. These amendments are applied to all areas and zones within the City, including when a subdivision is or is not required as part of a development application.

City of Encinitas SB 743 VMT Analysis Guidelines

The City of Encinitas SB 743 VMT Analysis Guidelines were adopted by the City Council on November 8, 2023. To comply with the requirements of SB 743, the City has identified VMT analysis methodology, established VMT thresholds for CEQA transportation impacts, and identified possible mitigation strategies. A detailed transportation VMT analysis is required for all land development projects, except those that meet at least one of the screening criteria, including small project daily vehicle trip screening, projects located in a transit-accessible area, projects in a VMT-efficient area, locally serving retail projects, locally serving public facilities, redevelopment projects with a lower total VMT, and affordable housing projects. VMT thresholds of significance are established for land development projects that do not screen out of a detailed evaluation. The City's VMT Guidelines also contain VMT analysis requirements for transportation projects, VMT reduction strategies and mitigation measures, and guidance for cumulative VMT analysis. Projects that have been deemed complete prior to the adoption of the City's VMT guidelines are not subject to the requirements of the VMT Analysis Guidelines, unless the project description has changed such that impacts need to be reassessed.

4.8.3 Thresholds and Methodology

4.8.3.1 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a significant impact associated with transportation would occur if implementation of the proposed project would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) regarding VMT (utilizing San Diego Institute of Transportation Engineers VMT threshold of 1,000 Average Daily Trips).
- Substantially increase hazards due to a geometric design feature (e.g., harp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.

4.8.3.2 Methodology

VMT Analysis

As discussed in Section 4.8.2.1, the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* states on page 8, "As noted above, lead agencies have the discretion to set or apply their own thresholds of significance." The project was deemed complete by the City on October 12, 2023, which was before the City Council passed the current City of Encinitas SB 743 VMT Analysis Guidelines on November 8, 2023. Because the VMT analysis for the project was completed prior to the adoption of the City's VMT Analysis Guidelines, City Engineering Staff requested that the project VMT analysis be based on the local San Diego Institute of Transportation Engineers (ITE) *Guidelines for Traffic Impact Studies in the San Diego Region* (ITE 2019). The 2019 San Diego ITE guidelines state that projects with less than 1,000 Average Daily Trips (ADT) that are consistent with the zoning are presumed to have *less-than-significant* VMT impacts.

Project Traffic Generation

Project traffic generation was calculated using SANDAG trip rates from the *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (SANDAG 2002). The traffic generation rate for single family homes is 10 trips per dwelling unit. With 27 single-family units proposed, project traffic generation is calculated at 270 ADT, with 21 trips occurring in the AM peak hour (6 inbound and 15 outbound) and 27 trips occurring in the PM peak hour (19 inbound and 8 outbound) (LOS Engineering 2024a).

4.8.4 Impact Analysis

4.8.4.1 Impact 4.8-1: Conflicts with Circulation System Program, Plan, Ordinance or Policy

The project does not propose any features inconsistent with applicable policies of the City's General Plan Circulation Element, as discussed below and in Section 4.6, *Land Use and Planning*.

The project design minimizes turning, curb parking, uncontrolled access, and frequent stops by constructing frontage improvements along Ocean Bluff Way and a private access road that contains off-street parking; therefore, it would not conflict with Policy 1.10 of the City's General Plan Circulation Element, which encourages minimizing turning, curb parking, uncontrolled access, and frequent stops. Pedestrian access would be provided as part of frontage improvements along Ocean Bluff Way, consistent with Policy 1.15. The project would not interfere with mass transit, bicycle, or equestrian transportation as there are no mass transit routes, bicycle paths, or equestrian paths on or directly adjacent to the project site, and no changes to such facilities are proposed. The project proposes the placement of street lighting within the private drive on the project site. Six pole lights are proposed and would comply with the requirements of the Encinitas Municipal Code, Section 30.040.010. The lights would be fully shielded with all light directed downwards and no upward light trespass and are dark-sky compliance (Visual Concepts Lighting 2024); thus, the project would not conflict with Circulation Element Policy 1.17.

The private roadway through the project would be constructed to applicable City and Fire Department standards and the single loop private drive would serve the new development and minimize through traffic in residential neighborhoods, consistent with Policies 2.2 and 2.3 of the General Plan. The project would widen the existing 26-foot-wide Ocean Bluff Way by 3.5 additional feet for a total paved width of 30 feet along the project site's approximately 440-foot frontage. Within the new 15-foot-wide parkway proposed on the north side of Ocean Bluff Way, the project would install new curb and gutter, sidewalk, pedestrian curb ramps and landscaping with street trees along the widened road to allow for pedestrian movement. Striping improvements would be implemented within the road. Entry signage and advanced curve warning signs would also be installed near the southeastern driveway location. A public street right-of-way dedication along the project's frontage with Ocean Bluff Way and a public easement over the private street (for road and utility purposes) would occur as part of the project. A landscape plan is reviewed and approved by the City prior to the issuance of permits, ensuring compliance with Policies 2.8, 2.10, and 2.13 of the General Plan. All improvements would be required to comply with the EMC and the Americans with Disabilities Act (ADA), thus, ensuring that the needs of the handicapped would be considered in the project development plans, consistent with Policy 3.1 of the General Plan.

The project would not conflict with plans or policies regarding existing or proposed transit, bicycle, and pedestrian facilities in the project vicinity, as there are no mass transit routes, bicycle paths, or equestrian paths on or directly adjacent to the project site and no changes to such facilities are proposed. Therefore, the project would not conflict with Policy 1.15. The project area is served by transit, as discussed in Section 4.8.1.2, *Transit Service*. The project does not propose any transit improvements, nor would the project adversely affect operation of or future access to existing bus and rail facilities in the area. The project includes minor widening and frontage improvements along Ocean Bluff Way, including curb, gutter, sidewalk, pedestrian ramps, and landscaping. All pedestrian facilities would meet ADA requirements and adhere to City design guidelines. The proposed frontage improvements would allow for connectivity with an existing pedestrian ramp at the east end of Ocean Bluff Way. The project would not remove any bicycle and pedestrian facilities, nor would it conflict with planned facilities in the project vicinity. As such, the project would not conflict with adopted policies, plans, and programs regarding public transit, bicycle, and pedestrian facilities. *No Impact* would occur.

4.8.4.2 Impact 4.8-2: Vehicle Miles Traveled

A VMT analysis was prepared for the project (LOS Engineering 2024a) and is provided in Appendix F. The project is consistent with the residential zoning for the site and has a calculated trip generation of 270 ADT, which is less than the ITE threshold of 1,000 ADT (LOS Engineering 2024a). Therefore, according to the San Diego ITE Guidelines, the project is presumed to have a *less-than-significant* VMT impact.

4.8.4.3 Impact 4.8-3: Hazards Due to Design Feature or Incompatible Use

The project would result in the widening of Ocean Bluff Way along the project frontage; however, the project does not propose changes to the configuration of any other existing roadways. Striping improvements would be implemented within the widened Ocean Bluff Way and entry signage and advanced curve warning signs would also be installed near the southeastern driveway location. The project includes the construction of a private loop road through the development. The private road

would provide access through the site from two stop-controlled driveways on Ocean Bluff Way and would provide ingress and egress for residents, access and a circular route for service vehicles, and emergency vehicle access. The Encinitas Fire Department, Engineering Department, and Traffic Engineering Department reviewed the proposed project and concluded it would not result in any circulation hazards or fire access issues. The proposed road varies in width but ranges from 24 to 37 feet in width. Project access is from two intersections on Ocean Bluff Way. The western intersection is a T-intersection with Ocean Bluff Way. The eastern intersection would have a slight offset from Camino Del Dorado. A site distance evaluation was conducted for the project (LOS Engineering 2024b), the results of which showed sufficient site distance at the eastern intersection; as such, the design of the driveway intersections would not create a hazard due to design feature. The design of the driveway intersections and road access has been reviewed and approved by the City and would not substantially increase hazards due to geometric design feature. Additionally, during project construction, the project applicant would be required to prepare a Traffic Control Plan pursuant to EMC Section 15.04.130 to ensure that adequate circulation is maintained during construction and no hazardous traffic conditions result from construction activities.

The proposed residential uses are not anticipated to generate the types of traffic that would be incompatible with the existing transportation network or composition of existing traffic in the area. Traffic generated by the project would include standard automobiles, bicycle, and pedestrian traffic, which would be consistent with the existing traffic in the area. For these reasons, the project would not substantially increase hazards due to incompatible uses. Impacts would be *less than significant*.

4.8.4.4 Impact 4.8-4: Inadequate Emergency Access

Access to the project site would occur from the two driveway intersections on Ocean Bluff Way, and interior circulation and access to the residences would be provided via a two-lane private road, as described in the response above. The project includes a new private road through the development and a widening of Ocean Bluff Way. The road widening and private road would be constructed consistent with Fire Department and City roadway requirements to ensure emergency access and egress would be maintained. The project would not impede access to any nearby roadways that may serve as emergency access routes in the project vicinity. During construction of the project, heavy construction vehicles could interfere with emergency response to the site (e.g., vehicles traveling behind a slow-moving truck or piece of equipment); however, emergency access to all surrounding properties would be maintained through the construction period. Additionally, a traffic control plan pursuant to EMC Section 15.04.130 would be implemented during construction to ensure that adequate access and circulation is maintained during project construction activities. The Encinitas Fire Department has reviewed the project and provided Fire Department conditions for the project, which would ensure adequate emergency access is maintained for the site. As such, the project would result in *less-than-significant* impacts associated with inadequate emergency access.

4.8.5 Level of Significance before Mitigation

Implementation of the project would result in *less-than-significant* impacts associated with transportation plans, VMT, transportation design hazards, and emergency access; therefore, no mitigation measures are required.

4.8.6 Mitigation Measures

No mitigation measures are required.

4.8.7 Level of Significance after Mitigation

Less-than-significant impacts to transportation are identified, and no mitigation measures are required.